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9 **IN THE UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 MATT FURIE,

12 Plaintiff,

13 vs.

14 INFOWARS, LLC; FREE SPEECH
15 SYSTEMS, LLC,

16 Defendants.

17 Case No. 2:18-cv-01830-MWF-JPR

18 **APPLICATION FOR LEAVE TO**
FILE UNREDACTED VERSION
OF EXHIBIT 1 TO
DEFENDANTS' REPLY IN
SUPPORT OF MOTION FOR
SUMMARY JUDGMENT UNDER
SEAL

19 Hon. Michael W. Fitzgerald

20 Case Filed: March 5, 2018

21 Trial Date: July 16, 2019

1 Pursuant to L.R. 79-5.2.2, Defendants Free Speech Systems, LLC (“FSS”) and
2 Infowars, LLC (“Infowars”) file their application for leave to file **Exhibit 1** to
3 Defendants’ Reply in Support of their concurrently-filed Motion for Summary
4 Judgment (the “Reply”) under seal. **Exhibit 1** to the Reply is a document designated
5 as Confidential pursuant to the Protective Order on file in this case (Doc. No. 62).
6 Specifically, this document is a licensing agreement Plaintiff Matt Furie entered into
7 with a third party, Momo Entertainment Limited, regarding use of the Pepe the Frog
8 character.

9 On April 19, 2019, counsel for the parties conferred regarding the necessity of
10 filing this designated document under seal, or if redactions would be appropriate.
11 Counsel for Plaintiff stated that this document did not need to be filed under seal in its
12 entirety and identified portions of this document to be redacted. Under L.R. 79-
13 5.2.2(a)-(b), a supporting declaration of counsel for Defendants is attached identifying
14 the redacted document and efforts made to resolve the issues of redaction and sealing.

16 Dated: April 22, 2019

17 Respectfully submitted,

18 RANDAZZA LEGAL GROUP, PLLC

19 /s/ Alex J. Shepard

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24 *Attorneys for Defendants,
Infowars, LLC and
Free Speech Systems, LLC*

1 Case No. 2:18-cv-01830-MWF-JPR

2 **CERTIFICATE OF SERVICE**

3 I HEREBY CERTIFY that on April 22, 2019, I electronically filed the foregoing
4 document with the Clerk of the Court using CM/ECF. I further certify that a true and
5 correct copy of the foregoing document is being served via transmission of Notice of
6 Electronic Filing generated by CM/ECF.

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8 Respectfully submitted,

9 /s/ Alex J. Shepard
10 Alex J. Shepard, CA Bar No. 295058

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